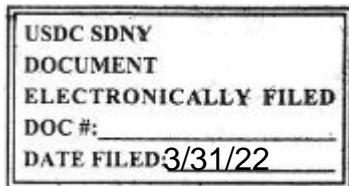


# Federal Defenders OF NEW YORK, INC.

Southern District  
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Southern District of New York  
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March 30, 2022

**BY ECF**

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**RE: United States v. Pierre Girgis  
22 Cr. 06 (AJN)**

Dear Judge Nathan:

I write to update the Court on the status of discovery in the above-captioned case and to seek a 30-day extension of today's deadline to propose a schedule for any defense motions to compel. The Government does not object to this application.

On March 9, 2022, the Government made a voluminous discovery production that included, inter alia, thousands of documents, forensic cell phone and electronic storage extractions, and thousands of recorded telephonic communications. The defense also understands that the Government anticipates making at least one additional Rule 16 production in the coming weeks. Given these developments and the defense's ongoing review of the discovery produced to date, we respectfully submit that it is premature to finalize a schedule for any motions to compel. Accordingly, the defense requests leave to provide an update and proposed motion-to-compel schedule by Monday, May 2, 2022, approximately 30 days from today.

SO ORDERED.

Respectfully Submitted,

Andrew J. Dalack, Esq.

Hannah McCrea, Esq.

Assistant Federal Defenders

Cc: AUSA Elinor Tarlow, Esq.  
AUSA Kyle Wirshba, Esq.

SO ORDERED.

3/31/22

United States Circuit Judge  
Sitting by Designation